

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

Case No. 2:22-cv-00422-JRG-RSP

JURY DEMANDED

**DECLARATION OF KRISTOPHER R. DAVIS IN SUPPORT OF
PLAINTIFF HEADWATER RESEARCH LLC'S RESPONSE TO SAMSUNG'S
SUPPLEMENTAL AUTHORITY REGARDING STANDING (DKT. 367)**

I, Kristopher R. Davis, declare and state as follows:

1. I am a member of the State Bar of California and a partner at the firm of Russ August & Kabat, counsel of record for Plaintiff Headwater Research LLC in the above-captioned action. I submit this declaration in support of Plaintiff's Response to Samsung's Supplemental Authority Regarding Standing (Dkt. 367). I have personal knowledge of the facts set forth herein, and if called upon to testify, could and would testify competently thereto.

2. Attached as Exhibit 1 is a true and correct copy of excerpts from the Initial Determination in ITC Inv. No. 337-TA-1100, dated July 12, 2019 (highlighting added).

3. Attached as Exhibit 2 is a true and correct copy of excerpts from the Commission Opinion in ITC Inv. No. 337-TA-1100, dated March 24, 2020 (highlighting added).

4. Attached as Exhibit 3 is a true and correct copy of excerpts from the deposition of Dr. Greg Raleigh in Case No. 2:23-cv-00103-JRG-RSP, dated June 14, 2024.

5. Attached as Exhibit 4 is a true and correct copy of HW103-00014134, which was Exhibit 12 to Dr. Raleigh's deposition in Case No. 2:23-cv-00103-JRG-RSP and is identical to the document at Tab 41 of Samsung's binder of potential exhibits for the July 25, 2024 evidentiary hearing in the present action.

Executed on July 29, 2024 in Los Angeles, California.

/s/ Kristopher R. Davis
Kristopher R. Davis

CERTIFICATE OF SERVICE

I hereby certify that on July 29, 2024, I electronically filed the foregoing document with the Clerk of the Court for the Eastern District of Texas, and served counsel of record with a copy via CM/ECF.

/s/ Kristopher R. Davis
Kristopher R. Davis